REMARKS

I.   General

Claims 1-20 are pending in the present Application. Claims 1-20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over US 6,977,961 (hereinafter *Eryurtlu*) in view of US 2007/0019856 (hereinafter *Furman*).

Applicant hereby traverses the rejections and requests reconsideration and withdrawal in light of the remarks contained herein.

II.   Claim Amendments

Independent claims 1, 10, 19, and 20 are amended to recite, in part, "computing a fusion matrix by fusing the current matrix of each sensor of the plurality of sensors." Support may be found at least at page 6, lines 16-27 of the specification. Thus, no new matter is added.

Claims 9 and 18 are amended to recite, in part, "wherein each sensor of the plurality of sensors is associated with a different wavelength range." Support may be found at the paragraph spanning pages 6-7 of the specification. Thus, no new matter is added.

III.   Claim Rejections

A.   Rejection over *Eryurtlu* in view of *Furman*

On pages 2-4, claims 1-20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Eryurtlu* in view of *Furman*. Applicant respectfully submits that *Eryurtlu* and *Furman* fail to teach or suggest in their entirety, all of the elements of the claims.

For instance, claim 1 recites, in part, "computing a fusion matrix by fusing the current matrix of each sensor of the plurality of sensors." Neither *Eryurtlu* nor *Furman* teach or suggest this feature of claim 1 because neither reference appears to teach or suggest computing a fusion matrix by fusing a current matrix of each sensor of a plurality of sensors. The Office Action cites *Eryurtlu* at FIGURE 1A, item 74, to teach the feature. Specifically, the Office Action asserts that such item of *Eryurtlu* shows a residual that is produced by subtracting the values in a motion compensated block of a previous frame from the values in

a current frame video matrix. In other words, the Office Action asserts that item 74 of *Eryurtlu* teaches subtracting values in a previous frame from the values in a current frame and that such subtraction provides fusion.[1] Even if such action in *Eryurtlu* could be described as "computing a fusion matrix," such feature still would not teach or suggest fusing a current matrix of each sensor of a plurality of sensors. In other words, using the Office Action's characterization of *Eryurtlu*, such action would be performed with regard to frames from two different times (*i.e.*, current and previous) rather than from each of a plurality of sensors. It is immediately apparent that the computation recited in claim 1 (above) is an entirely different computation from that of step 74 of *Eryurtlu*. Further, even if *Eryurtlu* were to include a plurality of sensors, it would not be possible to replace step 74 with the above-recited computation from claim 1 because such a combination would fail to produce the residual that the successive computations (*e.g.*, steps 76 and 78) of *Eryurtlu* rely upon. Accordingly, *Eryurtlu* does not teach or suggest, "computing a fusion matrix by fusing the current matrix of each sensor of the plurality of sensors."

The Office Action does not rely on *Furman* to teach or suggest the above-recited feature of claim 1, and it does not appear that *Furman* teaches such feature. Therefore, the cited combination of *Eryurtlu* and *Furman* fails to teach or suggest "computing a fusion matrix by fusing the current matrix of each sensor of the plurality of sensors," as recited by claim 1.

Independent claim 10 recites, in part, "compute a fusion matrix by fusing the current matrix of each sensor of the plurality of sensors." Further, independent claim 19 recites, in part, "computing a fusion matrix by fusing the current matrix of each sensor of the plurality of sensors." Moreover, independent claim 20 recites, in part, "computing a fusion matrix by fusing the current matrix of each sensor of the plurality of sensors." Applicant respectfully asserts that the above-recited features of claim 10, 19, and 20 are not taught or suggested by the combination of *Eryurtlu* and *Furman* at least for the same reasons discussed above with respect to claim 1.

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[1] Applicant does not admit that such feature of *Eryurtlu* teaches fusion (nor that such feature is characterized properly; however, Applicant addresses the Examiner's characterization for the sake of argument.

Dependent claims 2-9 and 11-19 each depend either directly or indirectly from respective independent claims 1 and 10 and, thus, inherit all of the limitations of their respective independent claims. Thus, the combination of *Eryurtlu* and *Furman* does not teach or suggest all claim limitations of claims 2-9 and 11-19. It is respectfully submitted that dependent claims 2-9 and 11-19 are allowable at least because of their dependence from their respective base claims for the reasons discussed above.

Additionally, the dependent claims recite features that are novel and nonobvious in their own rights. For instance, claims 9 and 18 recite, in part, "each sensor of the plurality of sensors is associated with a different wavelength range." The Office Action does not rely on *Eryurtlu* to teach or suggest the features, instead relying on *Furman* at paragraph [0062]. However, the cited portion of *Furman* merely says that one function (determining defects) may be performed using a first wavelength and that another function (determining position of optimum focus) may be performed using a second wavelength. This portion of *Furman* does not appear to teach or suggest that each sensor is associated with a different wavelength range.

Accordingly, Applicant respectfully requests the withdrawal of the 35 U.S.C. § 103 rejection of claims 1-20.

IV.   Conclusion

In view of the above, applicant believes the pending application is in condition for allowance.

Applicant believes a fee of $120.00 is due with this response. However, if additional fees are due, please charge our Deposit Account No. 06-2380, under Order No. 46030/P042US/10407177 from which the undersigned is authorized to draw.

Dated: December 19, 2007

Respectfully submitted,

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I hereby certify that this paper (along with any paper referred to as being attached or enclosed) is being transmitted via the Office electronic filing system in accordance with § 1.6(a)(4).

Dated: December 19, 2007

Signature: _____
Donna Dobson